

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
SANDRA LESLIE ADAMS	:	
fka Sandra Leslie Shaw	:	CASE NO. 1:19-bk-01886
Debtor	:	
	:	
QUICKEN LOANS INC.,	:	
Movant	:	
	:	
v.	:	
	:	
SANDRA LESLIE ADAMS	:	
fka Sandra Leslie Shaw,	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Proof that the Movant commenced mortgage foreclosure proceedings is demanded at trial and this averment is therefore denied.
6. Proof of default is demanded at trial and this averment is therefore denied pending Debtor's review of her records.
7. Proof of default amount is demanded at trial and this averment is therefore denied pending Debtor's review of her records.
8. Denied that Movant has demonstrated cause for relief.
9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com